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15 Attorneys for Plaintiff LFP IP, LLC

16 **UNITED STATES DISTRICT COURT**

17 **CENTRAL DISTRICT OF CALIFORNIA**

18 **LFP IP, LLC,** } Case No.: 2:16-cv-00166-FMO-RAO

19 vs. } **NOTICE OF JOINT MOTIONS**
20 **LEE KEITH BRETT,** } **FOR SUMMARY JUDGMENT**

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Date: May 18, 2017
Time: 10:00 a.m.
Place: Courtroom 6D

1 **TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:**
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4 **PLEASE TAKE NOTICE** that on May 18, 2017 at 10:00 a.m., or as soon
5 thereafter as counsel may be heard, in Courtroom 6D of the above-identified Court,
6 located at 350 W. 1st Street, 6th Floor, Los Angeles, CA 90012, Plaintiff LFP IP,
7 LLC will and hereby does move for Summary Judgment, or Partial Summary
8 Judgment, in favor of Plaintiff pursuant to Rule 56(c) of the Federal Rules of Civil
9 Procedure on Plaintiff's:

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11 (1) Count I - Federal Trademark Infringement (Registered Mark);
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13 (2) Count II – Federal Unfair Competition – False Designation of Origin; and
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15 (3) Count IV – Violation of the Anticybersquatting Consumer Protection Act.

16 Defendant Brett seeks:

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18 (1) Summary Judgment on his contention that: “LFP’S HUSTLER® marks
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20 are NOT famous and widely recognized by the general consuming public
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22 of the United States”;
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24 (2) Summary Judgment on his contention that: “Plaintiff’s HUSTLER® marks
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26 are NOT well-known by the general consuming public of the United
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28 States.”
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30 (3) Motion to dismiss on his contention that “Hustler is a generic word.”

1 This motion is made following the conference of counsel for Plaintiff LFP IP,
2 LLC and Pro Se Defendant Lee Keith Brett pursuant to L.R. 7-3 which took place
3 on multiple dates and times before the filing of this motion.
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5 Dated: April 20, 2017
6

7 MARK S. HOFFMAN, A
8 PROFESSIONAL CORPORATION
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11 LIPSITZ GREEN SCIME CAMBRIA LLP
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13 By: /s/ Jonathan W. Brown
14 Jonathan W. Brown, Esq.
15 Attorneys for Plaintiff LFP IP, LLC
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